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17 Attorneys for Plaintiffs
 CORY SPENCER, DIANA MILENA
 18 REED, and COASTAL PROTECTION
 RANGERS, INC.
 19

20 **UNITED STATES DISTRICT COURT**
 21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 22

23 CORY SPENCER, an individual;
 24 DIANA MILENA REED, an
 individual; and COASTAL
 25 PROTECTION RANGERS, INC., a
 26 California non-profit public benefit
 corporation,
 27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' REQUEST FOR
 JUDICIAL NOTICE IN SUPPORT OF
 OPPOSITION TO CITY
 DEFENDANTS' MOTION FOR
 SUMMARY JUDGMENT OR, IN THE
 ALTERNATIVE, SUMMARY
 ADJUDICATION**

1
2 v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including but
6 not limited to SANG LEE, BRANT
7 BLAKEMAN, ALAN JOHNSTON
8 AKA JALIAN JOHNSTON,
9 MICHAEL RAE PAPAYANS,
10 ANGELO FERRARA, FRANK
11 FERRARA, CHARLIE FERRARA,
and N. F.; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative
capacity; and DOES 1-10,

12 Defendants.
13

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

14 **TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR**
15 **RESPECTIVE ATTORNEYS OF RECORD:**

16 Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection
17 Rangers, Inc. ("Plaintiffs") respectfully request this Court take judicial notice,
18 pursuant to Rule 201(b)(2) of the Federal Rules of Civil Procedure, of the following:

19 1. Attached as Exhibit A is a true and correct copy of a July 5, 1991 Los
20 Angeles Times article authored by Tim Waters, entitled "The Hazards of Surfing
21 Lunada Bay : Peninsula: Outsiders run the risk of being pelted with rocks or having
22 their vehicles vandalized. The locals offer no apologies for treating the public area
23 as if it was their own." This article is available online through the Los Angeles
24 Times website at: [http://articles.latimes.com/1991-07-05/local/me-1657_1_lunada-](http://articles.latimes.com/1991-07-05/local/me-1657_1_lunada-bay)
25 [bay](http://articles.latimes.com/1991-07-05/local/me-1657_1_lunada-bay);

26 2. Attached as Exhibit B is a true and correct copy of a May 8, 1995 Los
27 Angeles Times article authored by Tony Perry, entitled "Turf Wars Spoil Sanctity of
28

1 Southland Surf Beaches : Violence: Popularity leads to crowding. Charges that one
 2 group attacked outsiders highlight the problem." This article is available online
 3 through the Los Angeles Times website at: [http://articles.latimes.com/1995-05-](http://articles.latimes.com/1995-05-08/news/mn-63795_1_lunada-bay)
 4 [08/news/mn-63795_1_lunada-bay](http://articles.latimes.com/1995-05-08/news/mn-63795_1_lunada-bay);

5 3. Attached as Exhibit C is a true and correct copy of a December 29,
 6 2016 report by Todd D. Minton and Zhen Zeng, Ph.D. from the Bureau of Justice
 7 Statistics entitled "Jail Inmates In 2015." This report is available online through the
 8 Bureau of Justice Statistics website at:
 9 <https://www.bjs.gov/index.cfm?ty=pbdetail&iid=5872>; and

10 4. Attached as Exhibit D is a true and correct copy of the Palos Verdes
 11 Homes Association's Protective Restrictions for Palos Verdes Estates. This
 12 document was obtained directly from the Palos Verdes Homes Association. Decl.
 13 A. Apostle, ¶ 7. Exhibit D consists of both the Protective Restrictions with whited
 14 out provisions and a copy of the Protective Restrictions with the white out removed.

15 The Court may take judicial notice of Exhibits A, B, C, and D under Federal
 16 Rule of Civil Procedure 201(b)(2) because these documents can be accurately and
 17 readily determined from sources whose accuracy cannot reasonably be questioned.

18 DATED: July 31, 2017

HANSON BRIDGETT LLP

19
 20
 21 By: /s/ Kurt A. Franklin

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